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Attorney for Plaintiff, Ikelene M. Boh.

IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF NEVADA

-----	:	Case No. 2:23-cv-00198-EJY
IKELENE M. BOH,	:	
Plaintiff	:	
v.	:	MOTION SEEKING
	:	EXTRA PAGES
KILOLO KIJAKZI,	:	
Acting Commissioner of Social Security,	:	
Defendant	:	Electronically Filed
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Plaintiff, Ikelene M. Boh, by and through attorney Hall Taylor, Esq. moves this court pursuant to LCivR 7-3(c), for an order authorizing Plaintiff to submit papers in support of her Motion for Reversal and Remand and Memorandum of Points and Authorities in Support of Motion in excess of twenty-four (24) pages in length as provided for by LCivR 7-3(b). Specifically, Plaintiff seeks an order of the court authorizing her to file papers in support up to forty (40) pages in length. In support of this motion, Plaintiff states:

1. On March July 21, 2016, Plaintiff filed an application for Title II Disability Insurance Benefits alleging disability beginning January 1, 2016. Administrative Transcript ("T") at 61, 75. Plaintiff's application was denied initially on November 22, 2016, and again on reconsideration on March 22, 2017. T 89-92. Plaintiff requested a hearing, and a hearing was held on March 1, 2019. T 42-60. The ALJ issued an unfavorable decision dated

1 March 18, 2019. T 20-31. The Appeals Council denied review (T 1), and Plaintiff  
2 appealed to the United States District Court for the District of Nevada where the matter  
3 was remanded for further proceedings pursuant to sentence four of 42 U.S.C. § 405(g).

4 2. Additional medical records were submitted by Plaintiff and on July 27, 2022, another  
5 hearing was held before an ALJ (T 982-1029), after which the ALJ issued an unfavorable  
6 decision dated, November 29, 2022 (T 950-71). Plaintiff bypassed written exceptions,  
7 thus rendering the ALJ's decision the final decision of the Commissioner once the  
8 Appeals Council did not review the claim on its own. 20 C.F.R. §§ 404.984(c)-(d),  
9 416.1484(c)-(d). Thus, this Court has jurisdiction.

10 3. Plaintiff requests forty (40) total pages due to the multiple hearings had in connection  
11 with the remand, additional disability development records, 653 pages of new medical  
12 records including new opinion evidence, and substantial errors of law in connection with  
13 such facts. Plaintiff requests these additional pages to adequately brief and examine the  
14 facts in connection with her arguments which necessitate additional pages. Plaintiff  
15 requests the Commissioner be granted the same number of excess pages to adequately  
16 address her portion on response.

17 4. Opposing counsel does not object to Plaintiff's request.  
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ELAYNA J. YOUCHAK  
UNITED STATES MAGISTRATE JUDGE

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